

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
W.R. GRACE & CO., *et al.*,)
Debtors.) Case No. 01-1139 (JKF)
) Jointly Administered
) Objection Date: March 23, 2007 @ 5:00 p.m. (proposed)
) Hearing Date: April 2, 2007 @ 2:00 p.m. (proposed)

NOTICE OF MOTION

TO: All Parties on the Attached List

PLEASE TAKE NOTICE, that on March 19, 2007, the Official Committee of Asbestos Personal Injury Claimants, and David T. Austern, the Court-appointed legal representative for future asbestos personal injury claimants filed and served the attached **Emergency Motion of the Official Committee of Asbestos Personal Injury Claimants and David T. Austern, the Court Appointed Legal Representative for Future Asbestos Personal Injury Claimants to Compel Debtors' Production of Complete Navigable Database** (the "Motion"), with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 5th Floor, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE, that any responses to the Motion must be in writing and filed with the Bankruptcy Court on or before **March 23, 2007 at 5:00 p.m.**

PLEASE TAKE FURTHER NOTICE, that at the same time, you must also serve a copy of the response upon the undersigned counsel, so that it is received on or before **March 23, 2007 at 5:00 p.m.**

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

IN THE EVENT THAT ANY OBJECTION OR RESPONSE IS FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, A HEARING ON THE MOTION WILL BE HELD BEFORE THE HONORABLE JUDITH K. FITZGERALD AT THE BANKRUPTCY COURT.

Dated: March 19, 2007

ORRICK, HERRINGTON & SUTCLIFFE LLP CAMPBELL & LEVINE, LLC

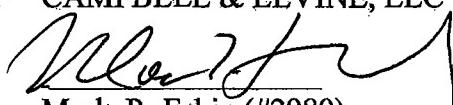
Debra L. Felder

Roger Frankel
Richard H. Wyron
Raymond G. Mullady, Jr.
Debra L. Felder
3050 K Street, NW
Washington, DC 20007
Telephone: (202) 339-8400

John Ansbro
ORRICK, HERRINGTON & SUTCLIFFE LLP
666 Fifth Avenue
New York, N.Y. 10103-0001
Telephone: (212) 506-5000

John C. Phillips, Jr. (#110)
PHILLIPS, GOLDMAN & SPENCE, P.A.
1200 North Broom Street
Wilmington, DE 19806
Telephone: (302) 655-4200

*Counsel for David T. Austern,
Future Claimants' Representative*



Marla R. Eskin (#2989)
Mark T. Hurford (#3299)
800 King Street, Suite 300
Wilmington, DE 19801
Telephone: (302) 426-1900

Elihu Inselbuch
CAPLIN & DRYSDALE,
CHARTERED
375 Park Avenue, 35th Floor
New York, NY 10152-3500
Telephone: (212) 319-7125

Peter Van N. Lockwood
Nathan D. Finch
James P. Wehner
CAPLIN & DRYSDALE,
CHARTERED
One Thomas Circle, NW
Washington, DC 20005
Telephone: (202) 862-5000

*Counsel for the Official Committee of
Asbestos Personal Injury Claimants*